

## Enforcement Updates – March 1, 2018

- i. SUSAN'S JAN 22 "INTERIM GUIDANCE" WORKING WITH STATES –
  - 1. Monthly RA check-ins with States – discuss guidance and level of coordination desired.
  - 2. Program-level EPA-State coord at least quarterly
  - 3. State requests for assistance
- ii. NEIs –
  - 1. R8 FOCUS ON ENERGY EXTRACTION; AIR TOXICS NEIs- WILL SHIFT TO WY AUDIT INITIATIVE AND COMPLETING TANKS/ LDAR CASES IN PIPELINE
  - 2. WORKING ON RCRA AIR EMISSIONS; CHEMICAL SAFETY
  - 3. INDUSTRIAL DISCHARGER NEI WORK WILL BE CUT SIGNIFICANTLY DUE TO LACK OF RESOURCES (STOP-GAP WORKSHARE WITH NEIC).
- iii. UPCOMING QUARTERLY STRATEGIC DISCUSSIONS WITH EACH REGION (4/5/18?)
  - 1. RESULTS
  - 2. FTE DEPLOYMENT (R8 has fewest OECA resources; life support)
  - 3. CENTERS OF EXCELLENCE AND OTHER APPROACHES TO SHARE RESOURCES
- iv. MEASURES –
  - 1. WORK WITH STATES ON NPDES SIGNIFICANT NON-COMPLIANCE MEASURE AND STATE REVIEW FRAMEWORK MEASURE.
  - 2. PACE OF JUDICIAL CASES Enforcement/Investigatory / Ex. 7(a)
  - 3. INSPECTION REPORTS-
- v. SEP POLICY REVISION
  - 1. STATE AGENCIES Enforcement/Investigatory / Ex. 7(a) MUNICIPALITIES, TRIBES -
- vi. PRIORITY MATTERS
  - 1. COLORADO SPRINGS UTILITIES
  - 2. BUTTE PRIORITY SOILS CONSENT DECREE
  - 3. WY O&G AUDIT INITIATIVE
  - 4. R8 LEAD INITIATIVE – working with OECA on updating enforcement strategy for TSCA (Lead Renovation & Repair Rule) and Drinking Water
  - 5. O&G ROUNDTABLE